

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Case No. 23-90716 (DRJ)
INSTANT BRANDS ACQUISITION	§	
HOLDINGS INC <i>et al.</i> ,	§	Chapter 11
	§	
Debtors. ¹	§	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that, pursuant to section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the law firms of Skadden, Arps, Slate, Meagher & Flom LLP and Norton Rose Fulbright US LLP (collectively, “Counsel”) hereby enter their appearance as counsel for Bank of America, N.A. in its capacity as administrative agent and collateral agent under the Debtors’ Prepetition ABL Facility and proposed ABL DIP Facility in the above-captioned cases.

PLEASE TAKE FURTHER NOTICE that Counsel requests that the undersigned be added to the official mailing matrix and service lists in the above captioned chapter 11 cases. Counsel requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007, and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in these chapter 11 cases and copies of all papers served or required to be served in these chapter 11 cases and all other matters arising herein or in any related adversary

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers or registration numbers in the applicable jurisdictions, are as follows: Instant Brands (Texas) Inc. (2526); Instant Brands Acquisition Holdings Inc. (9089); Instant Brands Acquisition Intermediate Holdings Inc. (3303); Instant Brands Holdings Inc. (3318); URS-1 (Charleroi) LLC (7347); Instant Brands LLC (0566); URS-2 (Corning) LLC (8085); Corelle Brands (Latin America) LLC (8862); EKCO Group, LLC (7167); EKCO Housewares, Inc. (0216); EKCO Manufacturing of Ohio, Inc. (7300); Corelle Brands (Canada) Inc. (5817); Instant Brands (Canada) Holding Inc. (4481); Instant Brands Inc. (9822); and Corelle Brands (GHC) LLC (9722). The address of the debtors’ corporate headquarters is 3025 Highland Parkway, Suite 700, Downers Grove, IL 60515.

proceeding, be given and served upon Bank of America, N.A. through service upon Counsel,
at the address, telephone, and email addresses set forth below:

James J. Mazza, Jr. (*pro hac vice* pending)
Robert E. Fitzgerald (*pro hac vice* pending)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
155 N. Wacker Drive
Chicago, Illinois 60606
Telephone: 312.407.0700
Email: james.mazza@skadden.com
Email: robert.fitzgerald@skadden.com

-and-

Angeline J. Hwang (*pro hac vice* pending)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
One Manhattan West
New York, NY 10001
Telephone: 212.735.3000
Email: angeline.hwang@skadden.com

-and-

Bob B. Bruner
Maria Mokrzycka
NORTON ROSE FULBRIGHT US LLP
1301 McKinney Street, Suite 5100
Houston, TX 77010
Telephone: (713) 651-5151
Email: bob.bruner@nortonrosefulbright.com
Email: maria.mokrzycka@nortonrosefulbright.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted or conveyed by mail, email, hand delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance, any subsequent appearance (by pleading or otherwise), nor any participation in or in connection with these cases is intended to be or shall be construed as (a) a waiver of Bank of America, N.A.'s right to assert that 28 U.S.C. § 157(b) is unconstitutional; (b) consent or submission by Bank of America, N.A., or waiver of Bank of America, N.A.'s right to object to, the jurisdiction of this Court for any purpose; (c) a waiver of Bank of America, N.A.'s right to have final orders in non-core matters entered only after de novo review by a District Court; (d) a waiver of any right of Bank of America, N.A. to trial by jury; (e) a waiver of Bank of America, N.A.'s right to have the reference withdrawn by a District Court for any matter involving Bank of America, N.A. or to assert that the reference has already been withdrawn; or (f) Bank of America, N.A.'s right to have any unliquidated portions of any claim determined by an applicable state court, all of which rights are expressly reserved.

PLEASE TAKE FURTHER NOTICE that this notice is without prejudice to any other rights, claims, actions, defenses, setoffs, or recoupments under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against any of the Debtors or any other entity either in these cases or in any other action are expressly reserved.

[Reminder of Page Intentionally Left Blank]

Dated: June 12, 2023
Houston, Texas

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ Bob B. Bruner
Bob B. Bruner (SBT 24062637)
Maria Mokrzycka (SBT 24119994)
1301 McKinney Street, Suite 5100
Houston, TX 77010
Telephone: (713) 651-5151
Email: bob.bruner@nortonrosefulbright.com
Email: maria.mokrzycka@nortonrosefulbright.com

-and-

**SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP**

James J. Mazza, Jr. (*pro hac vice* pending)
Robert E. Fitzgerald (*pro hac vice* pending)
155 N. Wacker Drive
Chicago, Illinois 60606
Telephone: 312.407.0700
Email: james.mazza@skadden.com
Email: robert.fitzgerald@skadden.com

Angeline J. Hwang (*pro hac vice* pending)
One Manhattan West
New York, NY 10001
Telephone: 212.735.3000
Email: angeline.hwang@skadden.com

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2023, a true and correct copy of the foregoing document was filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter.

/s/ Bob B. Bruner
Bob B. Bruner